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August 18, 2015

The Honorable Brian M. Cogan United States District Court Eastern District of New York 225 Cadman Plaza South Brooklyn, NY 11201

Re: <u>Huebner v. Midland Credit Management, Inc.</u>, Case No. 14-cv-06046-BMC Joint Request for Entry of Protective Order

Dear Judge Cogan:

I represent Defendant Midland Credit Management, Inc. ("Midland") in this matter. I write on behalf of both Plaintiff Huebner and Midland to jointly present a Proposed Stipulated Protective Order, attached as Exhibit A.

The Parties respectfully request entry of the proposed order to complete agreed upon document production between the two parties. Both Plaintiff's counsel and I have reviewed, approved and electronically signed the proposed order, and Plaintiff's counsel approved its filing.

Respectfully,

Matthew B. Johnson

Cc (via ECF): All counsel of record